



NATIONAL CONFERENCE *of* STATE LEGISLATURES

*The Forum for America's Ideas*

March 14, 2011

Administrator Lisa Jackson  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

**Richard Moore**  
*Senator  
Massachusetts Senate  
President, NCSL*

**Tim Rice**  
*Executive Director  
Illinois Legislative Information System  
Staff Chair, NCSL*

**William Pound**  
*Executive Director*

**Re: Solicitation of Input From Stakeholders To Inform the National Framework for Electronics Stewardship (Docket ID No. EPA-HQ-RCRA-2011-0185)**

Dear Administrator Jackson:

We are writing on behalf of the National Conference of State Legislatures (NCSL) in response to the agency's request for input from stakeholders on the development of a National Framework for Electronics Stewardship. As the Interagency Task Force on Electronics Stewardship reviews the array of issues involved with the life-cycle management of electronic waste we would urge you to recognize the importance of the existing state-federal partnership in managing the current stream of end-of-life electronics and promoting future product stewardship efforts.

NCSL supports efforts to increase the amount of electronic material that is removed from the waste stream and diverted from landfills and believes that the disincentives for reuse and recycling of such electronics scrap or e-scrap must be examined and mitigated by all relevant stakeholders. NCSL also encourages the full cooperation and assistance of the federal government in state efforts to promote responsible product stewardship and development of the necessary infrastructure to support the widespread recovery of a broad range of electronic equipment.

We recommend that the task force focus its efforts on the development of best practices and incentive programs that will help develop and advance the necessary national infrastructure needed to manage this waste stream that continues to grow at an exponential rate. These efforts by the task force could serve to dovetail existing state programs for the management of electronic waste without instituting unnecessary federal mandates or preempting existing state law.

If you have questions about these comments, or for further discussion, please do not hesitate to contact NCSL staff: Tamra Spielvogel (202-624-8690 or [tamra.spielvogel@ncsl.org](mailto:tamra.spielvogel@ncsl.org)) or James Ward (202-624-8683 or [james.ward@ncsl.org](mailto:james.ward@ncsl.org)). NCSL looks forward to continuing conversations with EPA over the coming months as the framework is developed.

Sincerely,

Representative Jeff Morris, Washington  
Chair, NCSL Environment Standing Committee

Senator Delores G. Kelley, Maryland  
Chair, NCSL Communications, Financial Services & Interstate  
Commerce Committee